

THE LAW OFFICES OF SEAN M. MAHER, PLLC

January 22, 2024

VIA ECF

Hon. Vincent L. Briccetti
United States District Judge
United States Courthouse
300 Quarropas Street
White Plains, New York 10601

APPLICATION GRANTED
SO ORDERED:

V. Sn
Vincent L. Briccetti, U.S.D.J.

Dated: *1/22/24*
White Plains, NY

Re: *United States v. Dayshawn Rivers*, 22 Cr. 485 (VB)
Change of residence bail condition modification request

Dear Judge Briccetti:

On behalf of defendant Dayshawn Rivers, I write to request that the Court modify Mr. Rivers' bail conditions to permit him to change residences. Currently, Mr. Rivers is on pretrial release with conditions including home detention with electronic monitoring. Mr. Rivers is living at his mother's residence in Mr. Vernon and would like to change his residence to that of Ms. Devonne Watkins. Together, Mr. Rivers and Ms. Watkins are the parents of a minor daughter.

Mr. Rivers has been living with his mother, however the only spare room available for him has extensive ceiling damage that permits rain water to flow straight into his room. With the drop in outside temperature, the room also becomes quite cold. Mr. Rivers would like to change residences to stay with Ms. Watkins. Ms. Watkins lives in the same neighborhood as Mr. Rivers' mother. Ms. Watkins' address has been provided to the government and to the Pretrial Services Office. The only occupants in Ms. Watkins' residence are Ms. Watkins and their young minor daughter.

I have relayed this request to both the Pretrial Services Office and the government. PTS Off. Leo Barrios has informed me that he has no objection to the proposed change of residence. He also informed me that he has been to Mr. Rivers' current residence, seen its conditions, and agrees that the conditions are "not good." AUSA Qais Ghafary has informed me that the government defers to the position of the Pretrial Services Office.

The Court's consideration is greatly appreciated.

Respectfully submitted,

/S/
Sean M. Maher
Counsel for Dayshawn Rivers

cc: All counsel via ECF

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